

**IN THE UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT**

LULA WILLIAMS,

Plaintiff-Appellee,

V.

No. 23-2097

MATT MARTORELLO.

Defendant-Appellant.

**JOINT MOTION TO LIFT MARCH 20, 2024 STAY AND SCHEDULE
ORAL ARGUMENT**

Appellant and Appellee jointly move the Court to lift its March 20, 2024 stay of proceedings and schedule oral argument on this appeal. In support of this motion the parties state as follows:

1. On February 26, 2024, this appeal was fully briefed.
2. On March 20, 2024, the Court granted the parties' motion to stay proceedings to permit the parties to engage in settlement discussions.
3. On September 20, 2024, Appellant Matt Martorello filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Northern District of Texas. Pursuant to Section 362(a) of the Bankruptcy Code, all actions against Mr.

Martorello in any form were stayed pending further order of the Bankruptcy Court.

4. The parties' settlement efforts were not successful.
5. The bankruptcy court's automatic stay was lifted on December 4, 2024.
6. With the parties' settlement efforts exhausted and the bankruptcy court's automatic stay lifted, this Court's stay is no longer necessary.

Accordingly, the parties respectfully request that the Court lift the March 20, 2024 stay and schedule oral argument on this appeal.

December 5, 2024

Respectfully submitted,

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